

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

KATHERINE R. DAUPHIN,

Plaintiff,

V.

LOUIS A. JENNINGS, JR.,

and

BEVERLY L. HENNAGER,

Defendants.

Civil Action No. 1:15-cv-149  
LO/TCB

## **NOTICE OF ATTORNEYS' CHARGING LIEN**

To: Hon. Paul F. Sheridan, Special Master  
c/o The McCommon Group  
6641 West Broad Street, Suite 400  
Richmond, Virginia 23230

Katherine R. Dauphin  
*Plaintiff*  
c/o Stephen G. Cochran, Esq.  
Caitlin Lhommedieu, Esq.  
ROEDER & COCHRAN, PLLC  
8280 Greensboro Drive, Suite 601  
McLean, VA 22102  
*Counsel for Plaintiff*

Louis A. Jennings, Jr.  
*Defendant*  
 8502 Willow Wish Court  
 Orlando, Florida 32835  
 Phone: 407-532-6350  
 Email: renaejennings@cfl.rr.com  
*Defendant Pro Se*

Michael Jennings  
*Third Party*  
c/o Timothy Hyland, Esq.  
HYLAND LAW, PLLC  
1818 Library Street  
Suite 500  
Reston, VA 20190  
*Counsel for Third Party Michael Jennings*

Beverly Hennager  
*Defendant pro se*  
315 Wood Lane  
Corvallis, MT 59828

YOU ARE HEREBY NOTIFIED that pursuant to the provisions of Virginia Code § 54.1-3932, TROUTMAN SANDERS LLP claims an Attorneys' Charging Lien upon all of the monies, properties, choses in action, claims and demands in suit, and upon any monies or property which may be awarded to Defendant BEVERLY L. HENNAGER, in this matter, and upon any money or other property due to BEVERLY L. HENNAGER in the hands of the Special Master.. The claim of this charging lien is imposed against, but not necessarily limited to, the following property located in Virginia:

BEVERLY L. HENNAGER's share of the net proceeds of sale of three parcels of realty reported by the Special Master in his December 22, 2016 Status Report to the Court, said proceeds being in the amount of \$10,186,665.89; and

BEVERLY L. HENNAGER's share of the net proceeds of the Assignment of the leasehold interest of Kay Jennings Family Limited Partnership to DAMN, LLC, reported by the Special Master in his June 14, 2017 Motion to Approve Payment of Expenses and Disburse Funds from Closing of Assignment Agreement to the Court, said proceeds being in the amount of \$2,400,000.00.

As grounds therefore, the undersigned states as follows:

1. TROUTMAN SANDERS LLP was retained by BEVERLY L. HENNAGER, on January 12, 2017 to represent her in the above-captioned suit.

2. The terms and conditions on which TROUTMAN SANDERS LLP agreed to represent BEVERLY L. HENNAGER are set forth in a certain Engagement Agreement between the parties dated January 12, 2017, a copy of which is filed herewith, under seal, as **Exhibit A**.

3. BEVERLY L. HENNAGER accrued legal bills related to these services totaling \$81,409.51, with no payments having been paid to TROUTMAN SANDERS LLP, apart from her initial \$5,000.00 retainer, resulting in a total amount owed of \$76,409.51. Monthly invoices with detailed time entries and specification of costs were emailed to BEVERLY L. HENNAGER by undersigned counsel during the representation and, after counsel made certain reductions requested by her, emailed again after the representation ended.

4. On May 3, 2017, the Court granted the Motion to Withdraw as counsel for BEVERLY L. HENNAGER filed by TROUTMAN SANDERS LLP, said withdrawal being requested by her.

5. Fees and costs incurred by the TROUTMAN SANDERS LLP in this matter since January 12, 2017, remain outstanding. A Statement of Fees incurred since January 12, 2017 is filed herewith, under seal, as **Exhibit B**. As of the date of this filing, August 1, 2017, BEVERLY L. HENNAGER is indebted to TROUTMAN SANDERS LLP in the amount of \$76,409.51 for fees and costs pursuant to the Engagement Agreement.

WHEREFORE, by this Notice, TROUTMAN SANDERS LLP hereby claims an Attorney's Charging Lien in the amount of \$76,409.51.

/s/ Stephen C. Piepgrass  
Stephen C. Piepgrass (VSB No. 71361)  
TROUTMAN SANDERS LLP  
1001 Haxall Point  
Richmond, Virginia 23219  
Phone: (804) 697-1320  
Fax: (804) 698-5147  
Email: [stephen.piepgrass@troutmansanders.com](mailto:stephen.piepgrass@troutmansanders.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of August, 2017, I filed a true and correct copy of the foregoing on the Court's Electronic Case Filing System, which will send a notice of electronic filing to:

Stephen G. Cochran  
Caitlin K. Lhommedieu  
ROEDER & COCHRAN PLLC  
8280 Greensboro Drive, Suite 601  
McLean, VA 22102  
Phone: 703-749-6034  
Fax: 703-749-6027  
Email: [scochran@rchlaw.net](mailto:scochran@rchlaw.net)  
[cklhomedieu@gmail.com](mailto:cklhomedieu@gmail.com)  
*Counsel for Plaintiff Katherine R. Dauphin*

Timothy Hyland, Esq.  
Elizabeth Dwyer, Esq.  
HARRIS, ST. LAURENT & CHAUDHRY LLP  
1818 Library Street, Suite 500  
Reston, VA 20190  
Phone: 703-956-3566  
Fax: 703-935-0349  
Email: [thyland@sc-harris.com](mailto:thyland@sc-harris.com)  
*Counsel for Third Party Michael Jennings*

and

Louis A. Jennings, Jr.  
8502 Willow Wish Court  
Orlando, FL 32835  
Phone: 407-532-6350  
Email: [renaejennings@cfl.rr.com](mailto:renaejennings@cfl.rr.com)  
*Defendant Pro Se*

Beverly L. Hennager  
315 Wood Lane  
Corvallis, MT 59828  
*Defendant Pro Se*

I further certify that a copy of the foregoing was sent to: (i) Beverly Hennager at [b@nefferdun.myrf.net](mailto:b@nefferdun.myrf.net); (ii) Renae Jennings at [renaejennings@cfl.rr.com](mailto:renaejennings@cfl.rr.com) and Louis Jennings at [laj@cfl.rr.com](mailto:laj@cfl.rr.com); and (iii) the Special Master, the Honorable Paul Sheridan, via electronic mail to the case managers, Ann Revercomb at [ARevercomb@mccammongroup.com](mailto:ARevercomb@mccammongroup.com) and Hunter Blair, at [HBlair@mccammongroup.com](mailto:HBlair@mccammongroup.com).

/s/ Stephen C. Piepgrass

Stephen C. Piepgrass (VSB No. 71361)

TROUTMAN SANDERS LLP

1001 Haxall Point

Richmond, VA 23219

Telephone No.: (804) 697-1320

Facsimile No.: (804) 698-5147

Email: [stephen.piepgrass@troutmansanders.com](mailto:stephen.piepgrass@troutmansanders.com)